UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Honorable André M. Espinosa

U.S.M.J.

JOUVIER A. BOISSEAU, JR.

Mag. No. 22-11244

I, John Havens, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

John Havens, Special Agent Federal Bureau of Investigation

Special Agent John Havens attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on August 24, 2022, in the District of New Jersey

HONORABLE ANDRÉ M. ESPINOSA UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

On or about August 15, 2022, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

JOUVIER A. BOISSEAU, JR.,

did knowingly and willfully obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, through the commission of a robbery, and did commit and threaten force, violence, and fear of injury to the person and property of another, namely, an employee of Car Dealership-1 in Garfield, New Jersey, in furtherance thereof.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

ATTACHMENT B

I, John Havens, am a Special Agent with the United States Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

- 1. At all times relevant to this complaint, the Victim was the employee of a used car dealership operating in and around Garfield, New Jersey ("Car Dealership-1" or the "Business") that purchases cars for resale. Many of the cars sold by the Business were first purchased by the Business from out-of-state sellers, to include sellers operating in New York, Pennsylvania, and Maryland.
- 2. As captured on video surveillance, on or about August 15, 2022, while inside the Business, two individuals robbed the Victim at gunpoint. Both individuals had masks covering their faces. Subsequent investigation revealed that one of the individuals was BOISSEAU.
- 3. Specifically, upon entering the Business, BOISSEAU and his co-conspirator ("Co-Conspirator-1") approached the Victim, who was seated behind a desk. BOISSEAU brandished a black handgun and pointed it at the Victim's face, while Co-Conspirator-1 stood over the Victim on the side opposite BOISSEAU.
- 4. BOISSEAU demanded the Victim's personal belongings, including the Victim's watch (the "Watch"), cell phone (the "Cell Phone"), and wallet, and threatened to kill the Victim, if the Victim did not comply. After taking the Victim's belongings, to include the Watch and the Cell Phone, BOUISSEAU rifled through the Victim's desk, stealing approximately \$3,000, which constituted proceeds collected by the Business from the sale of a car.
- 5. While still pointing the handgun at the Victim, BOISSEAU disconnected the telephone on the Victim's desk before he and Co-Conspirator-1 fled the Business.
- 6. Law enforcement responded to the Business and eventually located the Cell Phone underneath a car, several blocks from the Business, and processed the Cell Phone for fingerprints. The investigation later revealed that approximately two of the fingerprints found on the Cell Phone matched BOISSEAU's.

7. Later the same day, BOISSEAU entered a convenience store located on or around Main Street in Paterson, New Jersey (the "Store"), wearing clothing that appeared to match what BOISSEAU wore during the commission of the aforementioned robbery.